

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Monday, April 02, 2012 9:05 AM
To: SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov
Cc: Paul Minor; Popotnik, Frank; Tarka, Michelle
Subject: questions for WahChang Oregon

As we discussed on Friday, here are a couple questions for WahChang Oregon. Some of them are repetitive of questions asked of the other facilities, but I think it would be interesting to see if anything different turns up. thanks much

A. Since WahChang Oregon considers all the fines and grindings as their materials, and WahChang determines where all those materials go for recycling, they should be able to provide the following information.

1. Can you ask WahChang to provide all their documentation that would indicate how often and how much of their material (container numbers, total weights) they had shipped directly from ATI Precision Finishing Rochester PA, to other facilities for recycling/reclamation from January 2010 till now?
2. Is there a way to correlate the containers to the shipping documents, such as numbers, weights, designating markings, any method?
3. Were any of the drums of material shipped from Precision Finishing to another facility (either a recycler, or another one of their companies) and then returned to Rochester prior to shipment to Oregon? If so, provide all documentation.
4. Were any of their containers of materials, created at any of their facilities, within the past two years present at any facilities where a fire or incident occurred?
5. Can you ask how the containers from Rochester PA were shipped, specifically, whether they were drums or in overpacks?

B. Early on in the investigation into the WTI incident, Lorraine Davis at WTI talked to Eric Feist and Vince Brown of Veolia. Eric indicated the "drums sat at a recycler for a long time before they decided they couldn't handle them" and also that the "drums were in bad condition when they went back to WahChang and likely where they were contaminated with rain water (if they actually were)."

1. Can you ask WahChang when the drums on the July shipping document were actually created and placed into drums at ATI Precision Finishing?
2. When these containers were received from Precision Finishing at WahChang Oregon, what was the condition of the containers?
3. How and where were the containers stored at WahChang Oregon (outside)?
4. When was Veolia first contacted by any ATI company about the containers on the July shipping document? Provide documentation.

C. WTI personnel visited ATI WahChang in January 2012 as a factfinding mission due to their incident. Of the eight overpack containers that were opened at WTI, the eighth one contained an inner metal drum with NO metal lid. It is possible that this lid had a "designator location" or some other information that was not included in the shipment to WTI.

1. Can you ask about the missing lid and whether they would have that lid in their possession? If so, can it be viewed or photographed?

D. WahChang Oregon received the containers in order to evaluate the material and determine whether the material could be reused or recycled.

1. What processes or sampling was conducted or attempted?
2. What were the results? If they have an on-site lab, they would have lab records.

E. Can we get copies of all their records pertaining to the shipments Veolia arranged to leave ATI Precision Finishing Rochester PA from January 2010 till now? Those records include:

1. all versions of all profiles set up from both Precision Finishing Rochester PA and WahChang Oregon, through Veolia (formerly Onyx)
2. all email between WahChang Oregon and Veolia regarding the drums including condition, size, and material
3. all email between WahChang Oregon and Precision Finishing Rochester PA regarding these containers
4. all email between Precision Finishing Rochester PA and Veolia regarding these containers

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Monday, April 02, 2012 8:39 AM
To: schanilec.kevin@epamail.epa.gov
Cc: SHEWCZYK Susan; Paul Minor; Popotnik, Frank; Tarka, Michelle
Subject: Questions for Veolia, the broker

Kevin, here are a couple questions for Veolia, the broker of the waste.

A. Early on in the investigation into the WTI incident, Lorraine Davis at WTI talked to Eric Feist and Vince Brown of Veolia. Eric indicated the "drums sat at a recycler for a long time before they decided they couldn't handle them" and also that the "drums were in bad condition when they went back to WahChang and likely where they were contaminated with rain water (if they actually were)."

1. When was Veolia first contacted by any ATI company about the containers on the July shipping document? Provide documentation.
2. How did Veolia become aware of the condition of the containers?
3. Can you ask Veolia to provide documentation of all materials shipped off-site from ATI Precision Finishing Rochester PA, from January 2010 till now? This is important.
4. Is there a way to correlate the containers to the shipping documents, such as numbers, weights, designating markings, any method?
5. Were any containers shipped back to Rochester prior to shipment to Oregon? If so, when? Provide documentation.
6. Were any of their containers of materials generated within the past two years present at any facilities where a fire or incident occurred?
7. How were the containers from Rochester PA were shipped, specifically, whether they were drums or in overpacks?

B. Can we get copies of all their records pertaining to the shipments Veolia arranged to leave ATI Precision Finishing Rochester PA from January 2010 till now? Those records include:

1. all versions of all profiles set up from both Precision Finishing Rochester PA and WahChang Oregon, through Veolia (formerly Onyx)
2. all email between WahChang Oregon and Veolia regarding the drums including condition, size, and material
3. all email between WahChang Oregon and Precision Finishing Rochester PA regarding these containers
4. all email between Precision Finishing Rochester PA and Veolia regarding these containers

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Monday, April 02, 2012 8:18 AM
To: Paul Minor
Cc: SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov; Popotnik, Frank; Tarka, Michelle
Subject: Questions regarding ATI PF, Rochester PA

I have attached a scan of that email that I obtained this morning. You shared a document from ATI Precision Finishing showing 40 drums with ~48,000 lb weight estimate was picked up from Rochester PA between 7/13/2011 and 7/15/2011 and delivered to ATI WahChang Oregon.

All 40 containers received at WTI were 85gallon overpacks. Only the first eight containers were opened.

As we discussed on Friday, here are a couple questions.

A. Early on in the investigation into the WTI incident, Lorraine Davis at WTI talked to Eric Feist and Vince Brown of Veolia. Eric indicated the "drums sat at a recycler for a long time before they decided they couldn't handle them" and also that the "drums were in bad condition when they went back to WahChang and likely where they were contaminated with rain water (if they actually were)."

1. When was this material on the July shipping document actually created and placed into drums at ATI Precision Finishing? Provide documentation of X date to X date, and the year(s).
2. How long did these containers remain on-site prior to shipment, and where were the containers stored (outside)?
3. Can you ask ATI Precision Finishing to provide documentation of all materials shipped off-site from ATI Precision Finishing Rochester PA, from January 2010 till now? This is important.
4. Is there a way to correlate the containers to the shipping documents, such as numbers, weights, designating markings, any method?
5. Were these drums, or any of these drums, shipped to any other facility and returned to Rochester prior to shipment to Oregon? If so, where? Provide documentation.
6. Were any of their containers of materials generated within the past two years present at any facilities where a fire or incident occurred?

B. The first seven 55g metal containers were observed to all have holes in the lids. The seventh drum was pulled from the overpack and found to have dime-sized, regular-shaped holes in the bottom 1/3rd. These are NOT rust holes. Containers with holes would not have been DOT-shippable, so we need to determine when, where, and how the holes appeared in the containers.

1. Can you ask about the condition of containers when they left Rochester PA?

C. WTI personnel visited ATI Precision Finishing in February 2012 as a factfinding mission due to their incident. The WTI notes from that visit indicate that Precision Finishing marks the tops of their containers with a grease pencil, indicating the location where the containers are to be shipped. WTI personnel observed markings on top of the drums in storage. Of the eight overpack containers that were opened at WTI, the eighth one contained an inner metal drum with NO metal lid. It is possible that this lid had a "designator location" or some other information that was not included in the shipment to WTI.

1. Can you ask about those markings and what they designate?
2. Can you ask how many drums in a shipment would have the designated marking? All of them, or just a couple, or just one?
3. Can you ask how the containers from Rochester PA were shipped, specifically, whether they were drums or in overpacks?

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Monday, April 02, 2012 9:05 AM
To: SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov
Cc: Paul Minor; Popotnik, Frank; Tarka, Michelle
Subject: questions for WahChang Oregon

As we discussed on Friday, here are a couple questions for WahChang Oregon. Some of them are repetitive of questions asked of the other facilities, but I think it would be interesting to see if anything different turns up. thanks much

A. Since WahChang Oregon considers all the fines and grindings as their materials, and WahChang determines where all those materials go for recycling, they should be able to provide the following information.

1. Can you ask WahChang to provide all their documentation that would indicate how often and how much of their material (container numbers, total weights) they had shipped directly from ATI Precision Finishing Rochester PA, to other facilities for recycling/reclamation from January 2010 till now?
2. Is there a way to correlate the containers to the shipping documents, such as numbers, weights, designating markings, any method?
3. Were any of the drums of material shipped from Precision Finishing to another facility (either a recycler, or another one of their companies) and then returned to Rochester prior to shipment to Oregon? If so, provide all documentation.
4. Were any of their containers of materials, created at any of their facilities, within the past two years present at any facilities where a fire or incident occurred?
5. Can you ask how the containers from Rochester PA were shipped, specifically, whether they were drums or in overpacks?

B. Early on in the investigation into the WTI incident, Lorraine Davis at WTI talked to Eric Feist and Vince Brown of Veolia. Eric indicated the "drums sat at a recycler for a long time before they decided they couldn't handle them" and also that the "drums were in bad condition when they went back to WahChang and likely where they were contaminated with rain water (if they actually were)."

1. Can you ask WahChang when the drums on the July shipping document were actually created and placed into drums at ATI Precision Finishing?
2. When these containers were received from Precision Finishing at WahChang Oregon, what was the condition of the containers?
3. How and where were the containers stored at WahChang Oregon (outside)?
4. When was Veolia first contacted by any ATI company about the containers on the July shipping document? Provide documentation.

C. WTI personnel visited ATI WahChang in January 2012 as a factfinding mission due to their incident. Of the eight overpack containers that were opened at WTI, the eighth one contained an inner metal drum with NO metal lid. It is possible that this lid had a "designator location" or some other information that was not included in the shipment to WTI.

1. Can you ask about the missing lid and whether they would have that lid in their possession? If so, can it be viewed or photographed?

D. WahChang Oregon received the containers in order to evaluate the material and determine whether the material could be reused or recycled.

1. What processes or sampling was conducted or attempted?
2. What were the results? If they have an on-site lab, they would have lab records.

E. Can we get copies of all their records pertaining to the shipments Veolia arranged to leave ATI Precision Finishing Rochester PA from January 2010 till now? Those records include:

1. all versions of all profiles set up from both Precision Finishing Rochester PA and WahChang Oregon, through Veolia (formerly Onyx)
2. all email between WahChang Oregon and Veolia regarding the drums including condition, size, and material
3. all email between WahChang Oregon and Precision Finishing Rochester PA regarding these containers
- ☐ all email between Precision Finishing Rochester PA and Veolia regarding these containers

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Wednesday, April 04, 2012 9:24 AM
To: Minor, Paul; schanilec.kevin@epamail.epa.gov; SHEWCZYK Susan
Cc: Popotnik, Frank; Tarka, Michelle
Subject: RE: DEP Visit

Paul, again - thanks for those documents. Here are a few thoughts...

When WTI personnel interviewed Ryan Bodily (of WahChang) at ATI PF Rochester, during their Feb 2012 visit to Rochester - Ryan stated that it takes 6 to 9 months to create ~40 drums of Zr swarf. Up until I reviewed the docs you provided, I was under the impression that the Zr swarf shipped from Rochester was ALL created in Rochester. However, the shipping documents clearly indicate that on three of the four occasions, loads of Zr were consolidated from both the Rochester and Monaca facilities and shipped together to the recycling facility. The documents also indicate that Zr scrap was shipped more often than every 6-9 months. Perhaps previously, Zr swarf was created at several of their PA facilities, and those activities were consolidated into the Rochester facility recently.

The docs you provided show shipments of containers of approximately 40,000 lbs total were consistently shipped on Straight Bills of Lading through August Transport:

5/6/2010 - "15 drums on 4 skids of Zr scrap from Rochester, plus ____ drums on ____ skids of Zr scrap from Monaca" made up an unknown weight, as there is no weight entered in the total quantity block

7/19/2010 - "16 drums on 1 skid of Zr scrap from (R), plus an unknown number of drums on 3 skids (M) made up a 40,000 lb load"

8/11/2010 - "40 drums on 10 skids (7-M & 3-Roch) made up a 40,000 lb load"

8/26/2010 - "16 drums on 4 skids with no indication of which facility/how much, but again a 40,000 lb load"

All four of these Straight Bills of Lading indicate, in the basic description section: "hazardous group 4.2, ID-UN 1932, spontaneously combustible", packing group III, and all four have an "X" in the HM (Hazardous Materials) column. Per the 2008 DOT *Emergency Response Guidebook* - the UN 1932 is for zirconium scrap, and compares to Guide No. 135, which is for spontaneously combustible material.

To evaluate this - it seems odd that 15 drums fits on 4 skids, yet 16 drums fits on 1 skid, 40 drums fits on 10 skids, and 16 drums fit on 4 skids. So, the 7/19 Bill of Lading must really mean 16 drums on 4 skids.

According to all 4 of these shipping documents, they sent out ~40,000 lb of material in each shipment. So then, a shipment of 40 drums on 10 skids can weigh 40,000 lb (8/11) and yet 7 skids also weighs 40,000 lb (7/19, assuming 16 drums is actually 4 skids), and 16 drums on 4 skids also weighs 40,000 lb (8/26).

That means they are estimating that their drums vary in weight from as much as ~2,500 lbs to 1,000 lbs each (40,000 lb divided by 16 to up to 40 containers).

As a side note, I believe that DOT has weight restrictions per container. For zirconium materials, I think the maximum weight is ~ 880 lb per container. I have to further research this, so will get back to you on this. But, a 2,500 lb drum is nearly impossible for a number of reasons (the material would split the drum seams, it would be way too heavy per DOT, etc). However, unless they are weighing their containers, or weighing the vehicle before and after loading, or have other more accurate weights to provide, it appears that they have been shipping containers that weigh more than the DOT regulations would allow. So, something is not adding up correctly...

ATI PF Rochester stated that:

15 Drums of Zirconium swarf were generated in 2009/early 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on May 6, 2010.

16 Drums of Zirconium swarf were generated in early part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on July 19, 2010.

40 Drums of Zirconium swarf were generated in middle part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on August 11, 2010.

16 Drums of Zirconium swarf were generated in middle part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on August 26, 2010.

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Wednesday, April 04, 2012 9:24 AM
To: Minor, Paul; schanillec.kevin@epamail.epa.gov; SHEWCZYK Susan
Cc: Popotnik, Frank; Tarka, Michelle
Subject: RE: DEP Visit

Paul, again - thanks for those documents. Here are a few thoughts...

When WTI personnel interviewed Ryan Bodily (of WahChang) at ATI PF Rochester, during their Feb 2012 visit to Rochester - Ryan stated that it takes 6 to 9 months to create ~40 drums of Zr swarf. Up until I reviewed the docs you provided, I was under the impression that the Zr swarf shipped from Rochester was ALL created in Rochester. However, the shipping documents clearly indicate that on three of the four occasions, loads of Zr were consolidated from both the Rochester and Monaca facilities and shipped together to the recycling facility. The documents also indicate that Zr scrap was shipped more often than every 6-9 months. Perhaps previously, Zr swarf was created at several of their PA facilities, and those activities were consolidated into the Rochester facility recently.

The docs you provided show shipments of containers of approximately 40,000 lbs total were consistently shipped on Straight Bills of Lading through August Transport:

5/6/2010 - "15 drums on 4 skids of Zr scrap from Rochester, plus ____ drums on ____ skids of Zr scrap from Monaca" made up an unknown weight, as there is no weight entered in the total quantity block

7/19/2010 - "16 drums on 1 skid of Zr scrap from (R), plus an unknown number of drums on 3 skids (M) made up a 40,000 lb load"

8/11/2010 - "40 drums on 10 skids (7-M & 3-Roch) made up a 40,000 lb load"

8/26/2010 - "16 drums on 4 skids with no indication of which facility/how much, but again a 40,000 lb load"

All four of these Straight Bills of Lading indicate, in the basic description section: "hazardous group 4.2, ID-UN 1932, spontaneously combustible", packing group III, and all four have an "X" in the HM (Hazardous Materials) column. Per the 2008 DOT *Emergency Response Guidebook* - the UN 1932 is for zirconium scrap, and compares to Guide No. 135, which is for spontaneously combustible material.

4.2

To evaluate this - it seems odd that 15 drums fits on 4 skids, yet 16 drums fits on 1 skid, 40 drums fits on 10 skids, and 16 drums fit on 4 skids. So, the 7/19 Bill of Lading must really mean 16 drums on 4 skids.

According to all 4 of these shipping documents, they sent out ~40,000 lb of material in each shipment. So then, a shipment of 40 drums on 10 skids can weigh 40,000 lb (8/11) and yet 7 skids also weighs 40,000 lb (7/19, assuming 16 drums is actually 4 skids), and 16 drums on 4 skids also weighs 40,000 lb (8/26).

That means they are estimating that their drums vary in weight from as much as ~2,500 lbs to 1,000 lbs each (40,000 lb divided by 16 to up to 40 containers).

As a side note, I believe that DOT has weight restrictions per container. For zirconium materials, I think the maximum weight is ~ 880 lb per container. I have to further research this, so will get back to you on this. But, a 2,500 lb drum is nearly impossible for a number of reasons (the material would split the drum seams, it would be way too heavy per DOT, etc). However, unless they are weighing their containers, or weighing the vehicle before and after loading, or have other more accurate weights to provide, it appears that they have been shipping containers that weigh more than the DOT regulations would allow. So, something is not adding up correctly...

ATI PF Rochester stated that:

15 Drums of Zirconium swarf were generated in 2009/early 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on May 6, 2010.

16 Drums of Zirconium swarf were generated in early part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on July 19, 2010.

40 Drums of Zirconium swarf were generated in middle part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on August 11, 2010.

16 Drums of Zirconium swarf were generated in middle part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on August 26, 2010.

If they actually were sending out this material on a regular basis, as their 4 shipping documents indicate, then are there any docs from September 2010 through July 2011? July 2011 is the shipment which was shipped to ATI WahChang Oregon.

Then, there is the document showing the shipment from Rochester to WahChang. This document is completely different. Could we only have two pages of several? This document shows 40 containers, also 40,000 lb, also the HM block with an "X", but the description now reads "Zirconium scrap: borings, clippings, shavings, turnings or scalplings, zirconium grinder swarf". The hazard class is now 4.1 and the ID # is now 1358, packing group II. Per the 2008 DOT *Emergency Response Guidebook* - the UN 1358 is for Zirconium powder, wetted with not less than 25% water, or also for Zirconium metal, powder, wet. Both compare to Guide No. 170, which is for metals (powders, dusts, shavings, borings, turnings, or cuttings, etc).

When shipping from Rochester to a recycler - they used 4.2 spontaneously combustible. When shipping from Rochester to WahChang, they used 4.1 flammable solid (if we have the correct document to match up with the shipment from WahChang Oregon to WTI).

It might also be helpful to look at the IN-bound materials into Rochester to see whether there is something that we are missing. Perhaps some material was shipped off-site from Rochester and then at a later date was returned to Rochester. We still cannot account for the holes which were present in the drums processed here at WTI.

I am always available if you would like to discuss further. thanks again

From: Minor, Paul [pminor@pa.gov]
Sent: Wednesday, April 04, 2012 7:30 AM
To: Tarka, Michelle
Subject: FW: DEP Visit

FYI

Paul J. Minor | Field Operations Supervisor
Department of Environmental Protection
Southwest Regional Office
400 Waterfront Dr | Pittsburgh, PA 15222
Phone: 412.442.4147 | Fax: 412.442.4194
www.depweb.state.pa.us

From: Welsh, Gary L. [mailto:Gary.Welsh@ATImetals.com]
Sent: Tuesday, April 03, 2012 3:53 PM
To: Minor, Paul
Subject: RE: DEP Visit

Paul, you are correct, the shipping destination was New Cumberland WV. Please see the attached. Thank you Gary

From: Minor, Paul [mailto:pminor@pa.gov]
Sent: Tuesday, April 03, 2012 3:25 PM
To: Welsh, Gary L.
Subject: RE: DEP Visit

I'm not aware of a AL Solutions 'New Cumberland in Maryland. Are you sure it isn't New Cumberland, WV? In either case can ATI scan and email the shipping papers?

Paul J. Minor | Field Operations Supervisor
Department of Environmental Protection
Southwest Regional Office
400 Waterfront Dr | Pittsburgh, PA 15222
Phone: 412.442.4147 | Fax: 412.442.4194
www.depweb.state.pa.us

From: Welsh, Gary L. [<mailto:Gary.Welsh@ATImetals.com>]
Sent: Tuesday, April 03, 2012 12:26 PM
To: Minor, Paul
Subject: RE: DEP Visit

Good afternoon Paul, The following information is in response to your question regarding the generation and shipping quantities for Zirconium swarf for the years 2009 & 2010.

15 Drums of Zirconium swarf were generated in 2009/early 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on May 6, 2010.

16 Drums of Zirconium swarf were generated in early part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on July 19, 2010.

40 Drums of Zirconium swarf were generated in middle part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on August 11, 2010.

16 Drums of Zirconium swarf were generated in middle part of 2010 and shipped to Jamegy/AL Solutions in New Cumberland, MD for recycling as a product on August 26, 2010.

Please let us know if you have any further questions or require additional information. Thank you, Gary



Gary L Welsh
Manager Maintenance & Environmental Quality

ATI Precision Finishing
700 West New Castle St.
Zelienople, Pa. 16063
www.ATIPrecisionFinishing.com

T: 724-452-1040
F: 724-452-2346
C: 724-321-0304

From: Minor, Paul [<mailto:pminor@pa.gov>]
Sent: Monday, April 02, 2012 9:58 AM
To: Welsh, Gary L.
Subject: RE: DEP Visit

Gary, Could you give me a call when you have a chance. I had a couple follow up questions. I can be reached at my office number listed below. Thanks

Paul J. Minor | Field Operations Supervisor
Department of Environmental Protection
Southwest Regional Office
400 Waterfront Dr | Pittsburgh, PA 15222

Phone:412.442.4147 | Fax: 412.442.4194
www.depweb.state.pa.us

From: Welsh, Gary L. [<mailto:Gary.Welsh@ATImetals.com>]
Sent: Thursday, March 15, 2012 1:37 PM
To: Minor, Paul
Cc: Matsukas, Paul S
Subject: DEP Visit

Paul,I wanted to let you know that I will not be in the office on Friday. I will be back in the office Monday and will give you a call at that time. In the interim I have attached the 2011 Hazardous Waste Report for our Rochester Facility. Paul mentioned that you were inquiring as to our transformer disposal and previous Hazardous Waste disposal. Our goal has always been to operate our facilities hazardous waste free. To that end we use no wet type transformers and to my knowledge have never had a need for hazardous waste disposal at this facility.
Have a great weekend
Gary

From: Matsukas, Paul S
Sent: Tuesday, March 13, 2012 1:11 PM
To: Welsh, Gary L.
Subject: DEP Visit

Gary – Contact information attached. Paul Minor has a few follow up questions to be answered and asked if you could contact him Friday.

Thank you, Paul



Paul Matsukas
Monaca/Rochester Plant Manager

ATI Precision Finishing
499 Delaware Ave
Rochester, PA 15074
www.ATIPrecisionFinishing.com

T: 724-775-1664 Ext. 224
F: 724-775-1668
C: 724-480-5159



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

Western Region Salem Office

750 Front Street NE, Suite 120

Salem, OR 97301-1039

(503) 378-8240

FAX (503) 373-7944

TTY 711

April 13, 2012

Mr. Lee Weber
Director of Environmental Services
ATI - Wah Chang
1600 Old Salem Road
PO Box 460
Albany, Oregon 97321-0460

Pursuant to the authority of ORS 466.195, the Department of Environmental Quality is requesting some general information and specific information pertaining to manifest # 000167371 using profiles 92796-1 and/or 434443 dated 12/16/2011.

General requests:

- 1.) All exemptions and exclusions under 40 CFR 261.4(a)(17);
- 2.) All solid waste determinations for recycled materials under 40 CFR 261.2 through 261.6
- 3.) A list of all recycling media generated onsite, a description, point of generation, process that produces the recycling product, and where it goes, analytical results including WC mist and immersion testing, and friction testing for ignitable or reactive wastes;
- 4.) A list of offsite producers sending byproducts, co-products, or recycled media to ATI Wah Chang including generation location, description of process, profile #, analytical results;
- 5.) How does recycling media get sent out or sent to WTI Wah Chang (i.e. trip tickets, bills of lading, manifests); and
- 6.) A copy of the Contingency Plan

In regards to the forty drums listed on manifest # 000167371 using profile 434443 and 92796-1, provide answers to each question including all documentation for each question individually.

Documentation should include: where the drums were generated; process generating the media; drum number; carriers; transfer destinations; repackaging information; storage locations; drum description; dates; manifests; bills of lading; receipts; billings; weights; labeling; placarding; trip tickets; HW records; field logs; emails; and any other documents in reference to the forty drums listed on the manifest described above.

1) Please provide a list of the drums transported from ATI Wah Chang to WTI Heritage by listing the drum, drum number, description of contents, description and condition of the metal drum, whether it was overpacked, and if the metal drum was immersed in oil inside the overpack. Please provide this information in table form with the documents behind the table specifying which drums the supporting documents pertain to.

2) It is our understanding that there is an agreement between ATI-Wah Chang and ATI-Precision Finishing, where the zirconium fines and grindings are under the control of ATI-Wah Chang. And that ATI-Wah Chang determines where these materials go for recycling. Please provide the following information.

- a) A copy of the agreement between ATI-Wah Chang and ATI-Precision Finishing.

- b) Provide all documentation that would include how often and how much recycled material (container numbers, total weights) that was shipped directly from ATI Precision Finishing Rochester, PA to other facilities for recycling/reclamation from January 2010 until present.
- c) Is there a way to correlate the containers to the shipping documents, such as numbers, weights, designating markings, or any other method? Please provide this documentation and explain the correlation.
- d) Were any of the drums listed on manifest #000167371 shipped from Precision Finishing to another facility (either a recycler, or another one of their companies) and then returned to Rochester prior to shipment to ATI Wah Chang? If so, provide all documentation.
- e) Were any zirconium fines and/or grinding generated at any ATI facility, within the past three years present at any facilities where there was a fire, explosion or release? Discuss where it was generated and when and where the fire, explosion or release occurred.
- f) Were the 40 drums on manifest #000167371 the same containers received at Wah Chang from Rochester, PA? Where were the forty drums on manifest #000167371 generated from and where were they stored prior to coming to ATI Wah Chang? Were the 40 drums on manifest #000167371 taken anywhere else prior to coming to ATI Wah Chang? Did the forty drums listed on the July shipping document from ATI Precision Finishing to ATI Wah Chang go anywhere else or were the drums stored anywhere else? Were the forty drums on manifest #000167371 stored at ATI Wah Chang? How long? When were they overpacked and why?

3) The drums were shipped from ATI Precision Finishing to ATI Wah Chang.

- a) Were the drums on the July 2011 shipping document actually generated and placed into overpack drums at ATI Precision Finishing or at ATI Wah Chang? Where were they generated? Are these the same 40 drums on manifest #000167371 or had those initial drums been consolidated with others? If the drums were consolidated, explain by drum number what was included in each drum.
- b) When these containers were received from Precision Finishing at ATI Wah Chang, what was the condition of the containers? Please provide photos, analytical, documentation, sample results, etc. for each drum.
- c) How and where were the containers stored at ATI Wah Chang? Provide inspections and photos or other documentation about the storage and condition of the drums.
- d) When was Veolia first contacted by any ATI company about the containers on the July 2011 shipping document? Provide documentation.
- e) The Department understands that the 40 drums listed on manifest #000167371 were not in good condition and required overpacking. How did the drums become unsafe for transport?

4) ATI Wah Chang received the 40 drums listed on manifest #000167371 in order to evaluate the material and determine whether the material could be reused or recycled.

- a) What processes or sampling was conducted or attempted to make this determination? Provide documentation.
- b) Provide analytical results including QA/QC, all profiles, and inspection documentation specific to the 40 drums listed in manifest #000167371.

5) Since WTI Wah Chang sent material to be recycled by other ATI facilities, provide all shipments (shipping documents, trip tickets, manifests, etc.) for shipments that Veolia arranged to leave ATI Precision Finishing Rochester, PA from January 2010 until present.

Those records should include:

- a) All versions of all profiles set up from both Precision Finishing Rochester PA and ATI Wah Chang, through Veolia (formerly Onyx).
- b) All email between ATI Wah Chang and Veolia regarding the 40 drums on manifest #000167371 including condition, size, and material. All email between ATI Wah Chang and Precision Finishing Rochester, PA regarding these containers.
- c) All email between Precision Finishing Rochester, PA and Veolia regarding the 40 drums listed on manifest #000167371.

6) In reference to manifest #0001667371 using profiles 434443 and 92796-1

- a) Why were the drums in 55-gallon containers when WTI required only 30 gallon drums or 400 pound containers?

7) It is our understanding there were two shipments being discussed prior to sending the 40 drums on Manifest #000167371. They included 40 30 gallon containers and 40 55-gallon containers of metal fines that were being discussed in an e-mail between Eric Feist, WTI-Heritage, and Frank Hamilton, ATI-Wah Chang.

- a) Where these loads consolidated, sent together, or sent at different times to WTI Heritage? Please provide documentation for both loads if not the 40 drums listed on manifest #000167371. If they were the drums listed on manifest #000167371, provide the descriptions, drum numbers and which load they came from.

8) Please notify the Department prior to moving the 32 drums at WTI Heritage. In your notification please include when, where and how ATI Wah Chang intends to send the drums that are being stored at WTI Heritage. If there are samples being collected please send those analytical results prior to the movement of the drums.

The Department requests a written response by April 30, 2012. Should you have any questions about the content of this letter, feel free contact me in writing or by phone at 503-378-5310.

Please send your response to:

Susan Shewczyk
Department of Environmental Quality
750 Front Street NE., Suite 120
Salem, OR 97301-1039

Sincerely,

Susan Shewczyk
Hazardous Waste Inspector
Western Region

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
nt: Thursday, April 26, 2012 6:04 AM
to: FULLER Brian; SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov; Paul Minor
Cc: Popotnik, Frank
Subject: FW: questions regarding AL Solutions

fyl - response received from West Virginia

I do not know where Timet or RTI facilities are located.

From: Fenske, James R [James.R.Fenske@wv.gov]
Sent: Thursday, April 26, 2012 8:13 AM
To: Tarka, Michelle
Subject: RE: questions regarding AL Solutions

Responses to your questions:

- A. Drums are not normally stored vented. Shortly after the incident, it is possible the facility took measures to vent some drums within the press room (but not the bulk storage areas) that may have been exposed to the fire.
- B. No drums of un-processed material have left the facility since the fire to the best of my knowledge. Containers in storage have "flammable solid" placards. Unprocessed swarf comes from either Timet, RTI, or ATI facilities.
- C. It is my understanding that titanium was being processed at the time of the fire but some zirconium drums were in the press room.

From: Tarka, Michelle [mailto:Michelle.Tarka@epa.state.oh.us]
Sent: Monday, April 02, 2012 10:15 AM
To: Dorsey, Mike H; Zeto, Michael A; Fenske, James R
Cc: Popotnik, Frank
Subject: questions regarding AL Solutions

As part of Ohio's investigation into the incident at WTI involving zirconium swarf, I have a couple of questions regarding the AL Solutions incident in December 2010.

If you could provide some information, I would appreciate it. I can be reached at 330-385-8421 Monday/Wednesday 6:30 till 12:30, Tuesday/Thurs/Friday 6:30 till 5.

A. OSHA cited AL Solutions (#313378242) for having unvented containers of metals at the time of the incident. I was told by an emergency responder to AL Solutions that he thought drums on-site might have been vented during and/or after the incident by puncturing them with a "Halligan Bar" or "Hooligan Bar", a hand-held bar with a puncture point at the bottom that is swung towards a drum to cause a small hole. Holes might be in tops of lids, or along the bottom 1/3rd of a drum, most commonly.

- 1. Have WV DEP personnel observed any of the drums currently stored at AL Solutions vented in this manner?
- 2. Do you have any photos of drums at AL Solutions vented in this manner?

B. I have been told two conflicting stories. One story is that all the containers present on-site at the time of the fire are in fact, still on-site, and nothing has left the property. Another story is that containers have definitely left the property. I am looking for clarification.

1. Were any containers immediately after the incident, or any time since, sent back or retrieved by any companies?
2. If so, can you provide any details?
3. Are the labels of the containers stored outside still visible and legible?
4. Can the owner of the property determine where the containers that remain on-site came from?
5. Does the owner have records to show (even for billing purposes) what companies sent material, how many containers, weights, what was being processed at the time of the fire, any details at all?

C. There are conflicting stories as to which material might be responsible for the fire.

1. Can you identify whether zirconium or titanium was implicated in the incident?

This message was secured by ZixCorp^(R).

This message was secured by ZixCorp^(R).

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Monday, April 30, 2012 5:13 AM
To: SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov; daniel.kevin@epa.gov; FULLER Brian; Paul Minor
Cc: Mayhugh, Jeff; Matson.John@epamail.epa.gov; Popotnik, Frank
Subject: FW: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Susan and Kevin - per your Friday phone message requesting information:

I had provided all of the contact information to our central office for Region 10, Region 3, Oregon, and PA. I was not responsible for setting up the calls, and I was not involved in the first two calls (Wed, Thurs am) myself. I also did not know in advance who all was invited into the call on Thursday afternoon. I apologize for not making sure you were included in the call loop.

On the call Wednesday 4/25 were WTI (John Peterka, Carrie Beringer), attorneys for WTI (Charlie Bowers, Pat Krebs), Ohio EPA (Frank Popotnik) and the following US EPA people:

John Matson, ORC
Larry Johnson, ORC
Mike Cunningham, RCRA
Mark Durno, Superfund
Jason El-Zein, Superfund
Tricia Edwards, Superfund

There were 2 calls on Thursday (as you can see from the email attached below). I was not involved in the first call.

Here are the high points from the 2nd call on Thursday 4/26:
WahChang indicated they are looking at Chem Waste Management as the destination.

Heritage-WTI is preparing a plan for on-site management from WTI perspective (moving other waste away from the area, keeping WTI employees out of the area, etc). I have already discussed the general ideas regarding their plan, their specific plan is due to me on Tuesday am for review and discussion. ATI WahChang is preparing the actual plan for on-site activities, providing all personnel and gear, waste travel and treatment.

US EPA Region 5 contact is John Matson, phone number 312-886-2243. I have cc'd him to this email. I will be speaking with him Tuesday regarding WTI's plan.

The next call is scheduled for Wednesday 5/2 at 2 pm, Eastern Time. Call-in line number: 877-226-9607. Conference code: 323-948-4952

At the Wednesday call, the discussion will be regarding ATI's plan for bringing equipment (portable dock) and people on-site, placing containers into larger 110 g overpacks, adding water per DOT shipping, placing onto another trailer, and shipping waste off-site. My understanding is that they should have a draft written plan ready to discuss.

From: Mayhugh, Jeff
Sent: Thursday, April 26, 2012 3:55 PM
To: Allen, Pam; Freeman, Tracy
Cc: Anderson, Todd; Popotnik, Frank; Oryshkewych, Natalie; McCoy, Bruce; Tarka, Michelle; Princic, Kurt; Carroll, Jeremy
Subject: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Todd Anderson, Bruce McCoy and Jeff Mayhugh had a call today with Gary Victorine, Paul Little and Mike Cunningham of Region 5 to answer questions they had about the status of the zirconium waste that remains at WTI. This material was included in the shipment of waste from ATI Wah Chang in Oregon that caused the fatality at WTI in December of 2011.

WTI had contacted Region 5 to provide leverage with Wah Chang to remove the waste from WTI. This issue has been communicated to the Governor's office and allegedly to elected officials from WTI's area of the state.

After that call Todd Anderson, Bruce McCoy, Natalie Oryshkewych, Frank Popotnik and Michelle Tarka joined a call with Region 5 emergency response, WTI, ATI Wah Chang (generator) and Veolia (original broker) representatives and counsel to discuss Wah Chang's plan to prepare for proper transportation and removal of the drums of zirconium fines from WTI for chemical treatment in Oregon. Region 5 stated that they will initiate an emergency removal of the waste if the plan does not proceed and will want to see a draft proposal by next Wednesday.

We may need to provide some form of authorization for activities involved in the preparation and removal of the waste that fall outside WTI's existing permit. This may be accomplished using an emergency permit. Jeff will discuss this with Jeremy Carroll Friday so the process may proceed as quickly as possible.

SHEWCZYK Susan

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]
Sent: Monday, April 30, 2012 5:13 AM
To: SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov; daniel.kevin@epa.gov; FULLER Brian; Paul Minor
Cc: Mayhugh, Jeff; Matson.John@epamail.epa.gov; Popotnik, Frank
Subject: FW: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Susan and Kevin - per your Friday phone message requesting information:

I had provided all of the contact information to our central office for Region 10, Region 3, Oregon, and PA. I was not responsible for setting up the calls, and I was not involved in the first two calls (Wed, Thurs am) myself. I also did not know in advance who all was invited into the call on Thursday afternoon. I apologize for not making sure you were included in the call loop.

On the call Wednesday 4/25 were WTI (John Peterka, Carrie Beringer), attorneys for WTI (Charlie Bowers, Pat Krebs), Ohio EPA (Frank Popotnik) and the following US EPA people:

John Matson, ORC
Larry Johnson, ORC
Mike Cunningham, RCRA
Mark Durno, Superfund
Jason El-Zein, Superfund
Tricia Edwards, Superfund

There were 2 calls on Thursday (as you can see from the email attached below). I was not involved in the first call.

Here are the high points from the 2nd call on Thursday 4/26:
WahChang indicated they are looking at Chem Waste Management as the destination.

Heritage-WTI is preparing a plan for on-site management from WTI perspective (moving other waste away from the area, keeping WTI employees out of the area, etc). I have already discussed the general ideas regarding their plan, their specific plan is due to me on Tuesday am for review and discussion. ATI WahChang is preparing the actual plan for on-site activities, providing all personnel and gear, waste travel and treatment.

US EPA Region 5 contact is John Matson, phone number 312-886-2243. I have cc'd him to this email. I will be speaking with him Tuesday regarding WTI's plan.

The next call is scheduled for Wednesday 5/2 at 2 pm, Eastern Time. Call-in line number: 877-226-9607. Conference code: 323-948-4952

At the Wednesday call, the discussion will be regarding ATI's plan for bringing equipment (portable dock) and people on-site, placing containers into larger 110 g overpacks, adding water per DOT shipping, placing onto another trailer, and shipping waste off-site. My understanding is that they should have a draft written plan ready to discuss.

From: Mayhugh, Jeff
Sent: Thursday, April 26, 2012 3:55 PM
To: Allen, Pam; Freeman, Tracy
Cc: Anderson, Todd; Popotnik, Frank; Oryshkewych, Natalie; McCoy, Bruce; Tarka, Michelle; Princic, Kurt; Carroll, Jeremy
Subject: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Todd Anderson, Bruce McCoy and Jeff Mayhugh had a call today with Gary Victorine, Paul Little and Mike Cunningham of Region 5 to answer questions they had about the status of the zirconium waste that remains at WTI. This material was included in the shipment of waste from ATI Wah Chang in Oregon that caused the fatality at WTI in December of 2011.

SHEWCZYK Susan

From: FULLER Brian
Sent: Tuesday, May 01, 2012 11:22 AM
To: John Matson; Tarka, Michelle
Cc: Popotnik, Frank; Mayhugh, Jeff; Kevin Daniel; Kevin Schanilec; Paul Minor; SHEWCZYK Susan
Subject: RE: FW: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Hello All,

My understanding is that ATI-Wah Chang is in discussions with Clean Harbors to transport the waste to Chemical Waste Management of the Northwest in Arlington, OR (a RCRA Subtitle C Landfill). Oregon DEQ has been in communication with Chem Waste in regards to receiving the waste. The draft plan is for the waste to be placed into an isolated storage unit while the treatment/stabilization plan for the waste is finalized with DEQ input.

Thanks

Brian Fuller
Manager - Hazardous and Solid Waste Programs
Oregon DEQ - Western Region
541-687-7327 - Office
541-501-3349 - Mobile

<http://www.oregon.gov/DEQ/>

Messages to and from this e-mail address may be available to the public under Oregon Public Records Law.

From: John Matson [<mailto:Matson.John@epamail.epa.gov>]
Sent: Monday, April 30, 2012 9:04 AM
To: Tarka, Michelle
Cc: Popotnik, Frank; FULLER Brian; Mayhugh, Jeff; John Matson; Kevin Daniel; Kevin Schanilec; Paul Minor; SHEWCZYK Susan
Subject: Re: FW: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Thank you Michelle for that recap.

To everyone from Regions 3 and 10, and the States of Pennsylvania and Oregon, the immediate concern here stabilizing and to eliminating or reducing as much as possible the threat of combustion of the zirconium waste. Obviously there is a heightened urgency in doing so.

We would appreciate any and all help and assistance that you can offer or provide towards that goal, as well as our next concern; the safe handling, transport and disposal of the zirconium waste. I am available to discuss this at any time, so please do not hesitate to call.

John

John Matson
Associate Regional Counsel
United States Environmental Protection Agency

Region V
312.886.2243

"Tarka, Michelle" ---04/30/2012 07:13:30 AM---Susan and Kevin - per your Friday phone message requesting information: I had provided all of the co

From: "Tarka, Michelle" <Michelle.Tarka@epa.state.oh.us>
To: SHEWCZYK Susan <SHEWCZYK.Susan@deg.state.or.us>, Kevin Schanilec/R10/USEPA/US@EPA, Kevin Daniel/R3/USEPA/US, "FULLER.Brian@deg.state.or.us" <FULLER.Brian@deg.state.or.us>, Paul Minor <pminor@pa.gov>
Cc: "Mayhugh, Jeff" <jeff.mayhugh@epa.state.oh.us>, John Matson/R5/USEPA/US@EPA, "Popotnik, Frank" <frank.popotnik@epa.state.oh.us>
Date: 04/30/2012 07:13 AM
Subject: FW: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Susan and Kevin - per your Friday phone message requesting information:

I had provided all of the contact information to our central office for Region 10, Region 3, Oregon, and PA. I was not responsible for setting up the calls, and I was not involved in the first two calls (Wed, Thurs am) myself. I also did not know in advance who all was invited into the call on Thursday afternoon. I apologize for not making sure you were included in the call loop.

On the call Wednesday 4/25 were WTI (John Peterka, Carrie Beringer), attorneys for WTI (Charlie Bowers, Pat Krebs), Ohio EPA (Frank Popotnik) and the following US EPA people:

John Matson, ORC
Larry Johnson, ORC
Mike Cunningham, RCRA
Mark Durno, Superfund
Jason El-Zein, Superfund
Tricia Edwards, Superfund

There were 2 calls on Thursday (as you can see from the email attached below). I was not involved in the first call.

Here are the high points from the 2nd call on Thursday 4/26:
WahChang indicated they are looking at Chem Waste Management as the destination.

Heritage-WTI is preparing a plan for on-site management from WTI perspective (moving other waste away from the area, keeping WTI employees out of the area, etc). I have already discussed the general ideas regarding their plan, their specific plan is due to me on Tuesday am for review and discussion. ATI WahChang is preparing the actual plan for on-site activities, providing all personnel and gear, waste travel and treatment.

US EPA Region 5 contact is John Matson, phone number 312-886-2243. I have cc'd him to this email. I will be speaking with him Tuesday regarding WTI's plan.

The next call is scheduled for Wednesday 5/2 at 2 pm, Eastern Time. Call-in line number: 877-226-9607. Conference code: 323-948-4952

At the Wednesday call, the discussion will be regarding ATI's plan for bringing equipment (portable dock) and people on-site, placing containers into larger 110 g overpacks, adding water per DOT shipping, placing onto another trailer, and shipping waste off-site. My understanding is that they should have a draft written plan ready to discuss.

From: Mayhugh, Jeff
Sent: Thursday, April 26, 2012 3:55 PM
To: Allen, Pam; Freeman, Tracy

Cc: Anderson, Todd; Popotnik, Frank; Oryshkewych, Natalie; McCoy, Bruce; Tarka, Michelle; Princic, Kurt; Carroll, Jeremy
Subject: Conference calls today with NEDO, U. S. EPA Region 5, WTI, ATI Wah Chang and Veolia about 32 drums of Zirconium fines.

Todd Anderson, Bruce McCoy and Jeff Mayhugh had a call today with Gary Victorine, Paul Little and Mike Cunningham of Region 5 to answer questions they had about the status of the zirconium waste that remains at WTI. This material was included in the shipment of waste from ATI Wah Chang in Oregon that caused the fatality at WTI in December of 2011. WTI had contacted Region 5 to provide leverage with Wah Chang to remove the waste from WTI. This issue has been communicated to the Governor's office and allegedly to elected officials from WTI's area of the state.

After that call Todd Anderson, Bruce McCoy, Natalie Oryshkewych, Frank Popotnik and Michelle Tarka joined a call with Region 5 emergency response, WTI, ATI Wah Chang (generator) and Veolia (original broker) representatives and counsel to discuss Wah Chang's plan to prepare for proper transportation and removal of the drums of zirconium fines from WTI for chemical treatment in Oregon. Region 5 stated that they will initiate an emergency removal of the waste if the plan does not proceed and will want to see a draft proposal by next Wednesday.

We may need to provide some form of authorization for activities involved in the preparation and removal of the waste that fall outside WTI's existing permit. This may be accomplished using an emergency permit. Jeff will discuss this with Jeremy Carroll Friday so the process may proceed as quickly as possible.

WTI had contacted Region 5 to provide leverage with Wah Chang to remove the waste from WTI. This issue has been communicated to the Governor's office and allegedly to elected officials from WTI's area of the state.

After that call Todd Anderson, Bruce McCoy, Natalie Oryshkewych, Frank Popotnik and Michelle Tarka joined a call with Region 5 emergency response, WTI, ATI Wah Chang (generator) and Veolia (original broker) representatives and counsel to discuss Wah Chang's plan to prepare for proper transportation and removal of the drums of zirconium fines from WTI for chemical treatment in Oregon. Region 5 stated that they will initiate an emergency removal of the waste if the plan does not proceed and will want to see a draft proposal by next Wednesday.

We may need to provide some form of authorization for activities involved in the preparation and removal of the waste that fall outside WTI's existing permit. This may be accomplished using an emergency permit. Jeff will discuss this with Jeremy Carroll Friday so the process may proceed as quickly as possible.